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Attorneys for Plaintiff
7 FRANK ALLEN

8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**

10 **SAN FRANCISCO DIVISION**

11
12 **FRANK ALLEN,**

13 Plaintiff(s) ,

14 v.

15 **RADIO SHACK CORPORATION,**

16
17 Defendant(s).

Case No.: CV 11-03110 WHA
Judge: Hon. William H. Alsup

**PLAINTIFF'S NOTICE OF MOTION AND
MOTION FOR ATTORNEY FEES,
EXPERT WITNESS FEES & NON-
TAXABLE COSTS**

Date: April 25, 2013
Time: 8:00 a.m.
Dept: 8, 19th Floor

Judgment Entered: March 1, 2013

21 TO: Defendant RADIOSHACK CORPORATION and your attorneys of record:
22 PLEASE TAKE NOTICE that on May 16, 2013, at 8:00 am Plaintiff Frank Alen shall
23 appear in Department 8 of the United States District Court of California for the purpose
24 of seeking an order requiring Defendant RadioShack Corporation to pay Plaintiff the
25

26
27 Allen v. RadioShack, Case No. .CV 11-03110 WHA
Motion for Attorney Fees, Expert Witness Fees and Costs

1 attorney fees, expert witness fees and non taxable costs incurred by him in prosecuting
2 this matter.

3 The motion will be brought pursuant to Federal Rule of Court No. 54(d) and
4 California Government Code § 12965(b), as well as pursuant to Northern District Local
5 Rule No. 54.5.

6 Plaintiff Frank Allen is seeking an award of attorney fees in an amount set by the
7 Court based upon the lodestar amount of . He is requesting reimbursement of
8 expert witness fees of , and non taxable costs of .

9 This motion will be based upon these moving papers, the supporting
10 memorandum of points and authorities, the supporting declarations of all counsel who
11 represented Plaintiff in the course of this litigation: Angela Alioto, Angela Mia
12 Veronese, Steven L. Robinson, Joseph Alioto Veronese, Matthew J. Wayne and Jody
13 Meisel. In addition, the motion will be based upon the supporting declarations of Cliff
14 Palefsky and Richard Pearl. Copies of all declarations are attached to the Appendix of
15 Declarations in Support of Plaintiff's Motion for Attorney Fees filed with this motion.

16 Date: March 15, 2013

THE LAW OFFICES OF JOSEPH L. ALIOTO
& ANGELA ALIOTO

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18 /s/

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Steven L. Robinson
Attorneys for Plaintiff